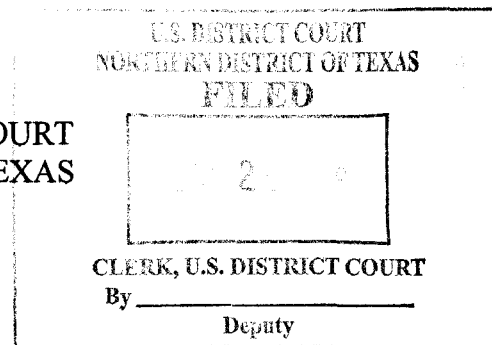


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:16-CR-213-A

JOSE PABLO MORALES (62)

FACTUAL RESUME

SUPERSEDING INFORMATION: Count One: Conspiracy to Possess a Controlled Substance with intent to Distribute (methamphetamine)
(in violation of 21 U.S.C. §§ 846; 841(a)(1) and (b)(1)(B))

PENALTY: \$5,000,000 fine - not less than 5 years' imprisonment and not more than 40 years' imprisonment, or both such fine and imprisonment, plus a term of supervised release of not less than 4 years.

MAXIMUM PENALTY:

\$5,000,000 fine and not less than five (5) years nor more than forty (40) years' imprisonment, plus a term of supervised release of not less than 4 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Superseding Information are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the information;

Second: That the defendant knew of the unlawful purpose of the agreement;

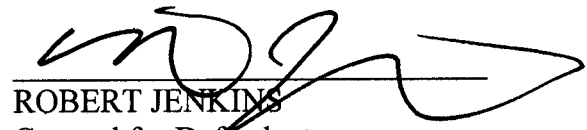
- Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and
- Fourth: That the overall scope of the conspiracy involved at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

In 2015 and 2016, Ashley Simpson and Trae Short obtained ounce-quantities of methamphetamine, sometimes on consignment, from Jose Pablo Morales. Ashley Simpson and Trae Short then distributed methamphetamine to others, returning to Jose Pablo Morales for additional methamphetamine. In this manner, Ashley Simpson, Trae Short, and Jose Pablo Morales conspired with each other and others to possess more than 50 grams of methamphetamine with intent to distribute.

SIGNED this 5th day of October, 2016.


JOSE PABLO MORALES
Defendant


ROBERT JENKINS
Counsel for Defendant